

PAUL J. ZOERB, and
 ETTA MAYE ZOERB, his wife
 Route# 3
 Frederick, Maryland 21701

Complainants

vs.

SILAS P. RICE
 Route# 1
 Fish Hatchery Rd.
 Thurmont, Maryland 21788

Respondent

IN THE
 CIRCUIT
 COURT
 FOR
 FREDERICK COUNTY
 MARYLAND
 EQUITY NO 25,501

BILL OF COMPLAINT TO QUIET TITLE
 TO ESTABLISH BOUNDARY LINES AND FURTHER RELIEF

The Bill of Complaint of Paul J. Zoerb and Etta Maye Zoerb, his wife, Complainants, by Herbert D. Morrison and Ted R. Hudson, their solicitors, respectfully represents unto this Court.

FIRST: That your Complainants are and have been fee simple owners of a certain improved parcel of land north of Frederick, on the south side of Fish Hatchery Road approximately four-tenths (4/10) of a mile west of U. S. Route 15 between Frederick and Thurmont, Maryland, in Frederick County, by virtue of a deed dated July 19, 1946 from William H. Lewis, et ux, and recorded among the Land Records of Frederick County, Maryland, in Liber 455, folio 276. A copy of said deed is attached hereto, marked "Exhibit 1" and prayed to be taken as a part hereof.

SECOND: That under date of July 29th, 1972, the property of Complainants was fully and carefully surveyed by Joseph F. Brown, a Maryland State Registered Surveyor, and a metes and bounds description was drawn based upon a full study of the Land Records of Frederick County, Maryland, field